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April 22, 2021

Honorable Freda L. Wolfson
Chief Judge
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Re: In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices
and Products Liability Litigation, MDL No. 2738

Dear Chief Judge Wolfson:

The parties were tasked with agreeing on a schedule for completion of any discovery and briefing for dispositive motions (other than *Daubert*) in the cases that did not advance to the trial pool. Ms. O'Dell, Ms. Parfit and I jointly submit this joint proposal to the Court for approval.

May 28 – completion of depositions requested by both sides for adjudication of motions

June 18– motions due

July 9 – opposition briefs due

July 21 – reply briefs due

We await to hear whether this is agreeable to Your Honor. Thank you for your continued consideration of these matters.

Respectfully submitted,

/s/ Susan Sharko

Susan M. Sharko

SMS

cc: Michelle A. Parfitt, Esq.
P. Leigh O'Dell, Esq.
Thomas T. Locke, Esq.

ACTIVE.126856715.01

SO ORDERED.

DATED: April 22, 2021

/s/ Freda L. Wolfson
Freda L. Wolfson
U.S. Chief District Judge